

1 Q Sure, to the best of your recollection.

2 A I'm trying to envision what we were
3 concerned about. I believe it -- I just don't know,
4 ma'am. I believe it probably focused a lot on jobs.
5 It may have focused on qualities and competence, but I
6 just don't remember.

7 Q Sure. And so, you know, these
8 organizations, do you recall for a project like this
9 one how much Freedom Vote was given to complete that
10 project?

11 A No, it was, I believe, in the millions, but
12 maybe it was only in the hundreds of thousands. I
13 really don't know.

14 Q Sure, that's understandable. And the same
15 with Mr. Whatman, what did he ask Freedom Vote to do?
16 What did that entail?

17 A Pardon?

18 Q When Mr. Whatman asked Freedom Vote to do
19 some projects, what were those projects?

20 A He asked us to do one project, I think, that
21 involved the context of a Senate race. I think he
22 asked us to do a project. I think we were thinking
23 about doing a project in the surrounding area. Again,
24 it's just way more than I can remember.

25 Q I understand. So you mentioned that it was

1 about the way that you had raised this money. It
2 seems like it was that an organization would ask
3 Freedom Vote to do a project and would give Freedom
4 Vote the funds to complete this project, is that
5 correct?

6 A No, not always. Sometimes -- and, again, I
7 may need to defer to the lawyer -- but there were
8 certain times when, given the nature of what Freedom
9 Vote was doing, that we would get grants from other
10 (c)(3)s or (c)(4)s. Sometimes there was direct
11 fundraising into Freedom Vote. There was no single
12 model.

13 Q Sure, and that makes sense that you'd want
14 to sort of cover all your bases. Can you sort of
15 recall what Freedom Vote would tell its donors in
16 order to get money coming in?

17 A It would depend on the project. That's a
18 very -- I mean, I know you want to be general, but
19 that's way, way, way too general anyway. You asked it
20 way too general.

21 Q Understood. So give me an example.

22 A No, what we would tell them is that their
23 Executive Director was a really nice guy and people
24 would be happy if the Executive Director was happy, so
25 please write a check.

1 Q Let's go ahead and go through the project.
2 How did you -- you know, so you sort of implied that
3 Mr. Whatman came to Freedom Vote, is that correct?
4 Did Mr. Whatman come to you, or did Freedom Vote go to
5 Mr. Whatman and say, hey, we've got a project, let me
6 pitch it to you?

7 A More the other way, the first way.

8 Q So Mr. Whatman came to you?

9 A Correct. That would be the more -- not
10 exclusive, but that would be the more common tactic.

11 Q And so how did people sort of know that
12 Freedom Vote was out there to do these projects?

13 A Again, I think it was the quality of the
14 good looks in their handsome Executive Director.
15 You'd have to ask those two. I wouldn't know. But I
16 believe it was my good looks if you ask, and charming
17 personality, but maybe that's not what others would
18 say.

19 Q Well, I have no doubt. But how about the
20 other project you mentioned with Mr. Walsh? Did he
21 come to you as well, or was that something that you
22 pitched to him?

23 A No. Again, we never -- no, I don't want to
24 say never. We did not pitch projects. People would
25 come to us with projects. Occasionally, we would put

1 out feelers, but, generally, we did not pitch
2 projects.

3 Q Can you recall any examples of times that
4 you put out feelers sort of how that went and to who?

5 A Again, and I know this is not always what
6 you want to hear, but there's Freedom Vote and there's
7 my firm, and I just can't always separate which was
8 which. When I answered that we would have put out
9 feelers, it's because it would make sense that we put
10 out feelers. It's what groups do to be viable. But
11 that doesn't mean I can remember the specifics.

12 Q I understand that, and I appreciate your
13 candor, and I understand that, you know, it's very
14 difficult, especially when you're doing work at the
15 same time, to sort of extricate what was for which
16 client. So I understand that.

17 So, say, when someone came to you with a
18 project and you needed to raise money to complete it,
19 how did you do that? You know, did you -- what did
20 you tell donors to make them want to give you money?

21 A We would tell them the nature of what we
22 were doing and why we felt it was important and that
23 we would hope they would support it.

24 Q Okay. So were you personally involved in
25 fundraising for Freedom Vote?